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**Before the  
Federal Communications Commission  
Washington, D. C. 20554**

In the Matter of )  
 )  
LMCC proposal to share the part 97 ) RM-9267  
Amateur Radio allocation at 420-430 )  
and 440 to 450 MHz. )  
 )

To: Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Washington D.C. 20554

**Comments of  
The San Bernardino Microwave Society  
In Response to FCC RM-9267**

From: Larry Johnston,  
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**Comments of**  
**The San Bernardino Microwave Society**  
**In Response to FCC RM-9267**

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By the Membership:

**Statement in Opposition to:**  
**Federal Communications Commission RM-9267**

1. The San Bernardino Microwave Society is opposed to the proposal by the Land Mobile Communications Council which requests a new use of the spectrum currently allocated to the Amateur Radio service in the frequency ranges of 420-430 and 440-450 MHz. We are opposed to this proposal for the following reasons:

- a) The Amateur Radio allocation in the 420-430 and 440-450 MHz frequency bands are heavily used throughout the United States.
- b) The proposed new allocation in these frequency ranges are for services which currently have substantial existing as well as future spectrum allocations in the VHF and UHF ranges.
- c) The proposed new allocation in these bands will not promote efficient use of any current or future allocation for the requested services.
- d) There are no remedies presented as to how incumbent Amateur users of the affected bands will be protected from interference caused by the proposed new services.

**Introduction**

2. The San Bernardino Microwave Society (SBMS or the Society) is a non-profit technical organization "dedicated to the advancement of communications above 1 GHz". Our membership primarily consists of college-educated professionals employed in the high-tek electronics or defense industries. The membership also includes individuals of all levels of technical knowledge. The Society was formed forty-five years ago as a vehicle for sharing technical information relating to microwaves and to promote activity

within the Amateur Radio Service through its microwave frequency allocations. As members of the Amateur Radio community, we are dedicated to upholding the long tradition of technical advancement and unselfish community service entrusted to all Radio Amateurs through the establishment of the Amateur Radio Service.

3. The Society depends heavily on the ability to coordinate its many technical activities through the widespread and varied uses of the frequency allocations at 420-430 and 440-450 MHz.

### **Comments**

4. The Land Mobile Communications Council (LMCC) has proposed a new use of the frequency spectrum ranging from 420-430 and 440-450 MHz. Like all previous proposers/proposals made to the Federal Communications Commission (FCC) requesting changes to this as well as other Amateur Radio allocations, the LMCC wants use of the spectrum without satisfactorily addressing the technical issues of sharing. For this reason alone we feel that the FCC should dismiss the proposal as technically unfeasible. We also question the proposal from other viewpoints as well.

5. Specifically, the Amateur allocations at 420-430 and 450-470 MHz are heavily used throughout the southwestern United States which is the area in which the Society primarily operates. It is well documented that a similar level of activity exists all over the United States. The LMCC proposes to share this heavily used band with similar technologies and operating practices currently in widespread use by Radio Amateurs. It does not require an imagination to see that this proposal simply will not work.

6. Also of interest is the fact that virtually all participants in the LMCC already have substantial existing frequency allocations (30-50, 152-174, 450-512, 806-870 MHz as well as others). There is also an allocation currently being considered by the FCC for use by LMCC members and others to use UHF television channels 60-69. Future requirements could/will be met when VHF television channels are vacated by broadcasters which have moved to spectrally-efficient and more profitable digital formats on UHF channels.

7. As industry leaders, what have the LMCC members accomplished in the area of Refarming their existing allocations? From our perspective, they have done nothing to promote the technically sound ideas that came with Refarming like bandwidth reduction through narrowband techniques employing either analog or digital modulation. Within their current proposal the LMCC members indicate that they will be utilizing similar technologies and techniques which they currently employ in their existing allocations. We are unaware of any widespread use of narrowband technologies being employed in the existing allocations used by LMCC members. We are also unaware of any solid

schedules for when existing systems using existing allocations will be converted to newer spectrally-efficient technologies.

### **Conclusion**

6. The San Bernardino Microwave Society is opposed the proposal by the LMCC for a new allocation at 420-430 and 440-450 MHz. The LMCC proposal is unnecessary because they have demonstrated that they are not currently utilizing the full technical potential of the existing frequency allocations entrusted to their members. Additionally, they have not addressed the issues of sharing with the heavily used existing Amateur Radio Service allocation. The FCC should require the LMCC to demonstrate that they have effectively utilized their current allocations before a proposal for a new allocation is considered. For these reasons, we urge the FCC to dismiss this proposal as unnecessary and technically unsound.

For the membership,  
Richard Bremer, President  
San Bernardino Microwave Society

A handwritten signature in cursive script that reads "Richard Bremer". Below the signature, the word "Duc" is written in a smaller, less legible cursive script.